



Ohio's Perspective on the Total Coliform Rule

TCR Workshop, Washington DC

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January 31, 2006

Background



- Ohio is a primacy state in Region V
- Public water systems are required to perform their own compliance monitoring
- General Monitoring Requirements
 - Monthly for CWS
 - Quarterly for NCWS
- Only community and surface water non-community public water systems are required to disinfect

Ohio's TCR Changes



- Reflect a migration of our confidence in total coliform as public health indicator
- Revisions to Ohio's TCR in 1993 and 1999
- 1999 – Added further speciation for *E.coli* and fecal
- Current revisions will remove Acute MCL for failure to perform repeat sampling
- Current revisions will address USEPA concerns; however Ohio maintains the TCR could be revised to expand flexibility as intended in 1989

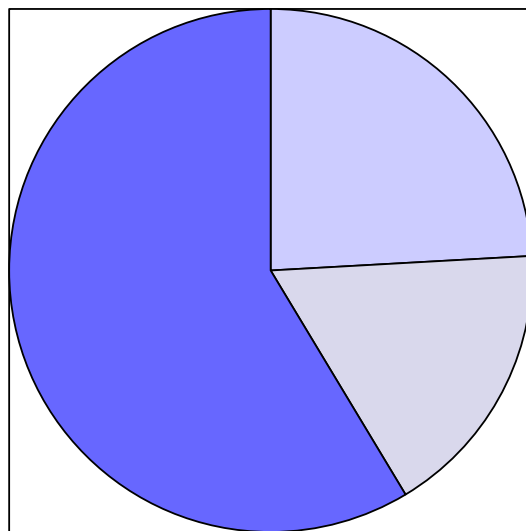
TCR Monitoring and MCLs

- TCR works for Community Water Systems
 - Even small CWS
- TCR does not work for most NCWS
 - Ground Water Source
 - Performing Quarterly Monitoring
 - No Continuous Disinfection

Typical NCWS in Ohio



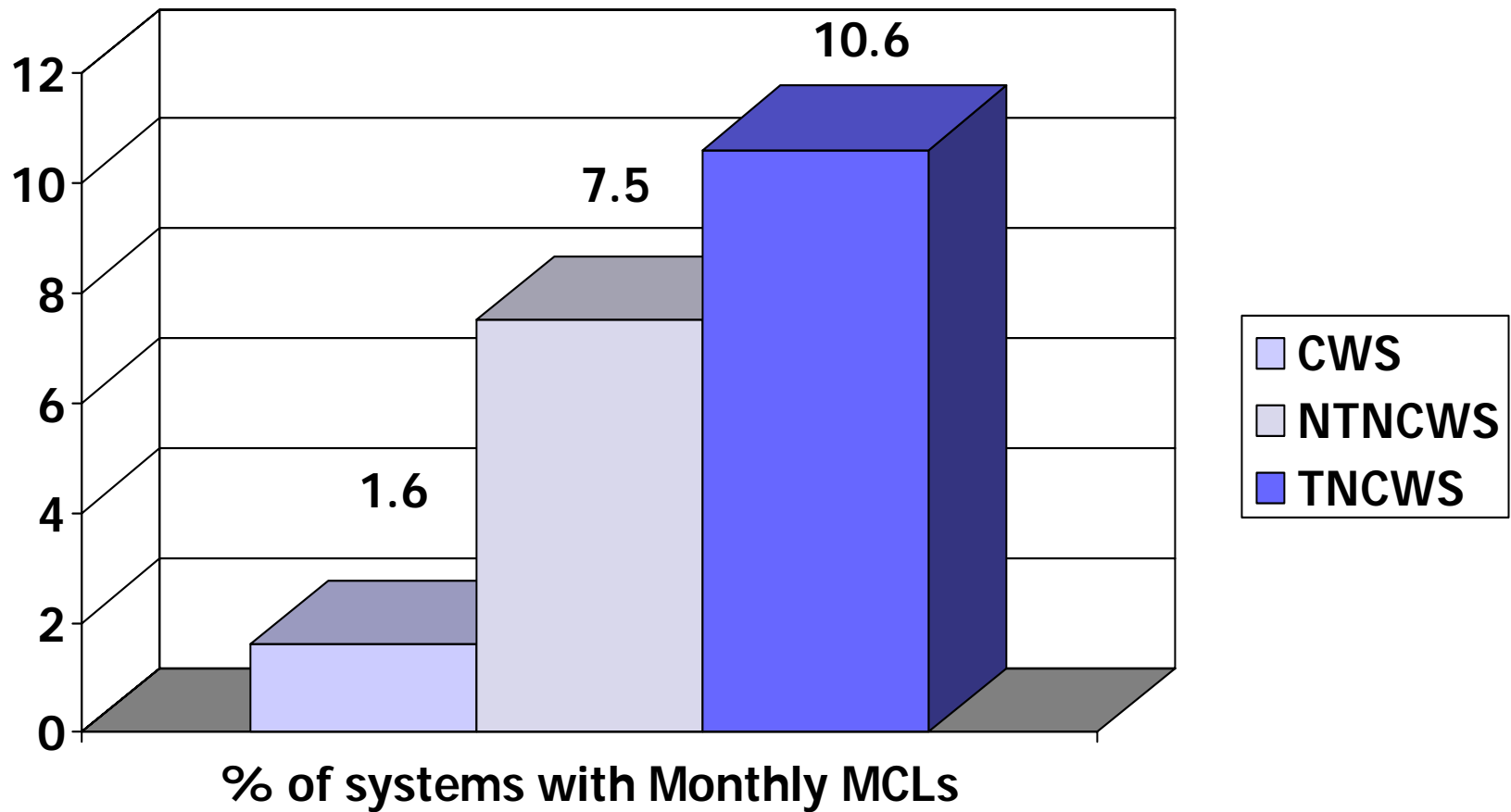
Ohio PWS



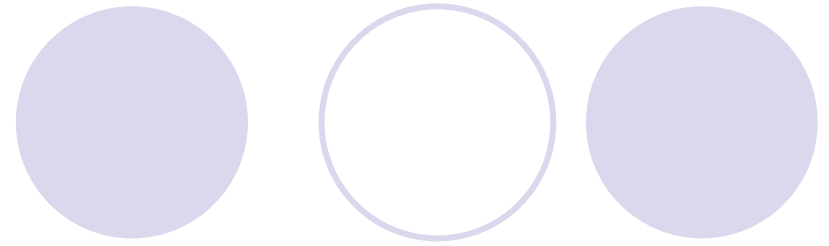
- Community
- Non-transient
- Transient

CWS	NTNC	TNC	Total
1291	917	3128	5336

2005 Monthly MCLs

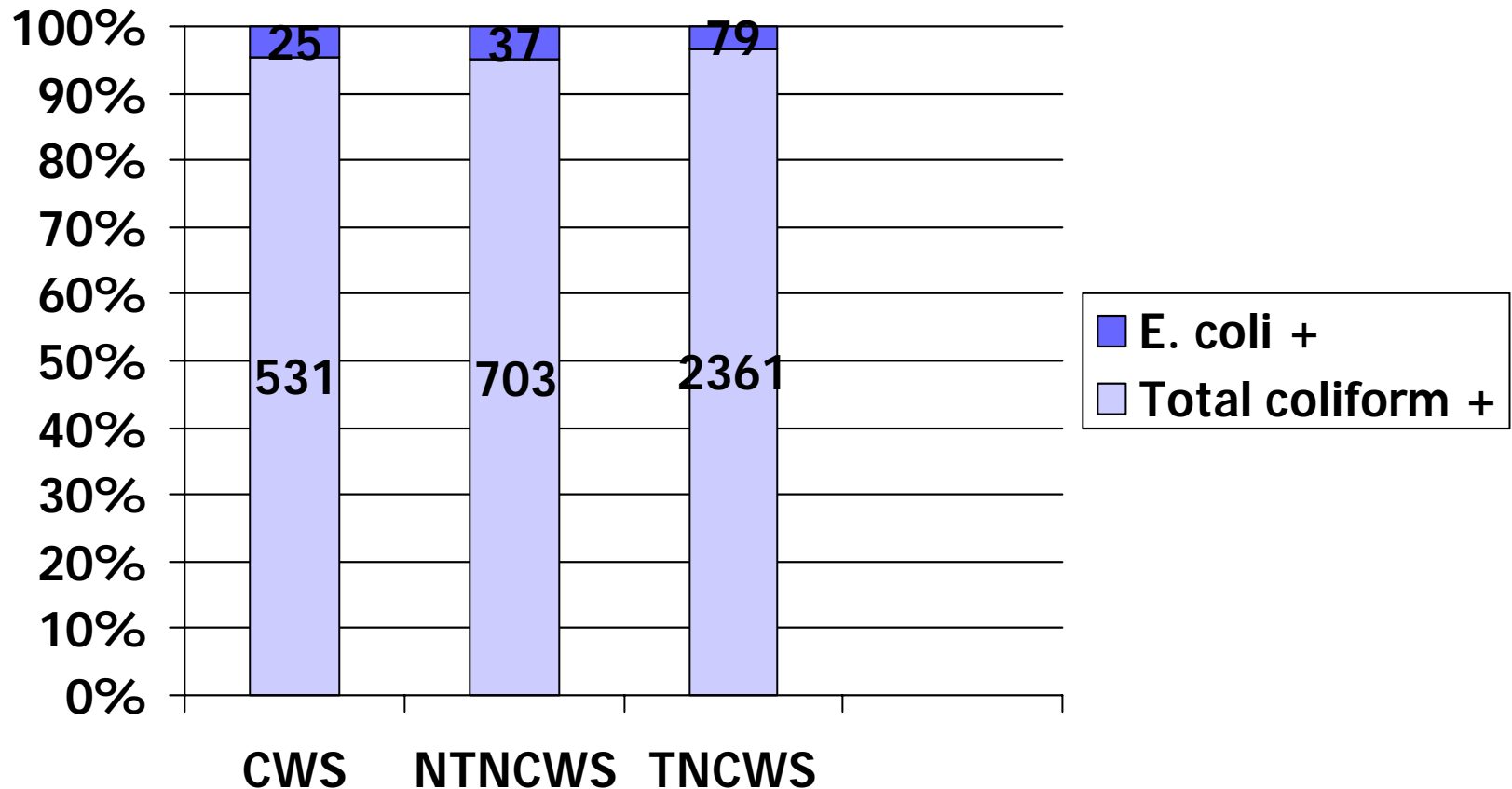


Public Notification



- Continued concerns with the public notice for Monthly MCLs
- Use an online Advisory Tracker for Acute MCLs
 - <http://www.epa.state.oh.us/ddagw/Advisories/Advisories.htm>
- Monthly MCLs are not on the advisory tracker

2006 Total Coliform Positive Sample Data





Why TCR does not fit NCWS

- NCWS do not have distribution systems – they have plumbing
 - Streamness doesn't work
 - Often not enough sample sites
- Finding causes of TC+ in NCWS takes time – often more than a quarter, but monitoring continues
- Incentive to not monitor



Process of Elimination

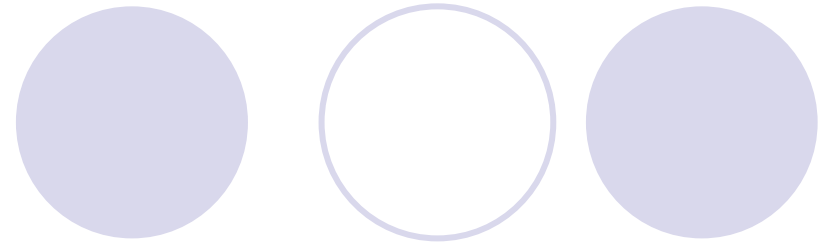
- Investigate Geographic and Geological Area
- Well Driller Inspections
- Down-hole Camera Inspections
- Licensed Plumbing Inspections
- How much and what type of sampling should occur during this process?

Ohio's TCR Revisions



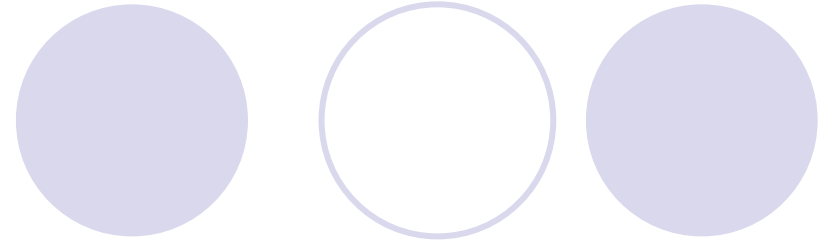
- TCR does not have to answer all microbiological questions
- For NCWS will use:
 - Ground Water Rule
 - Source Water Program
 - Well Construction

TCR Wish List



- Flexibility to reduce sampling w/o site visit when NCWS are doing investigations into:
 - Geology
 - Well Construction
 - Plumbing
- Move away from sample nomenclature for NCWS – repeats and routines –try to quantify a number of samples you need due to limited taps
- For all PWS, what the Monthly MCL PN should say about health risks

Distribution Issues



- Ohio has:
 - Backflow Prevention Rules
 - Depressurization Requirements
 - Chlorine Residual Requirements for all CWS and surface water NCWS
 - It has been challenging to maintain and clarify Ohio specific requirements

Conclusions



- Revising Ohio's rules to meet USEPA requirements and reduce Acute MCLs
- Ohio struggles to determine public health ramifications of total coliform positive samples
- Ohio will use other programs to evaluate NCWS microbiological quality
- Can not treat NCWS equally as CWS
 - NCWS have plumbing, not distribution systems